



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Certified # *P731918255*

Refer to: 1950450006 -- Whiteside County
Rock Falls/Haas & Haas, Inc.
IL0061047502

COMPLIANCE INQUIRY LETTER

July 19, 1985

EPA Region 5 Records Ctr.



334757

Mr. Jerry Kostner
Haas & Haas, Inc. Roxite Division
802 East 11th Street, P.O. Box 830
Rock Falls, Illinois 61071

Dear Mr. Kostner:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of Title 35, Ill. Adm. Code Parts 725 and 722 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance as listed in Attachment A are based on an inspection completed on June 25, 1985. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations and prevent further violations. The written response should be sent to the following:

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

In addition, include in your response two copies of written program needed for documentation.

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



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If you have any questions regarding the above, please contact Mr. Jack Holzer at 815/987-7404.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark A. Haney".

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:JEH:CD:sf/1600e,28-29

cc: Division File ✓
Rockford Region
Steve Strauss
Cindy Davis

Masonite Corp
Roxite Div.

1L0061047502



Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.114(a)/(b), the owner or operator must prevent unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of a facility by providing 24-hour surveillance or a means to control entry using an artificial or natural barrier and controlled access points. You are in apparent violation of 725.114(a)/(b) for the following reason(s): a means to control entry was not provided.
2. Pursuant to 35 Ill. Adm. Code 725.114(c), the owner or operator must post a sign with the legend "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion. At the time of the inspection, no "Danger" sign was posted at the entrance which is in apparent violation of this Section.
3. Pursuant to 35 Ill. Adm. Code 725.115(b), the owner or operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. This schedule must be kept at the facility and must identify the types of problems which are to be looked for during the inspection. The schedule should allow for daily inspection of areas subject to spills, when those areas are in use. You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reasons(s): no schedule has been developed.
4. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years. You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason(s): no inspection log or summary has been developed.
5. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must maintain the following documents and records at the facility:
 - 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
 - 2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
 - 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;



- 4) Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that number(s) 2, 3, and 4 above were not maintained at the facility.

6. Pursuant to 35 Ill. Adm. Code 725.117(a), the owner or operator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste. You are in apparent violation of 35 Ill. Adm. Code 725.117(a) for the following reason(s): "No Smoking" signs were not placed where there is a hazard from ignitable waste.
7. Pursuant to 35 Ill. Adm. Code 725.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 725.151(a) for the following reason(s): no contingency plan has been developed.
8. Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason(s): no arrangements have been established to familiarize local police, fire departments and hospitals with the hazardous aspects of your facility.
9. Pursuant to 35 Ill. Adm. Code 725.155, at all times there must be at least one emergency coordinator either on the facility premises or on call. You are in apparent violation of 35 Ill. Adm. Code 725.155 for the following reason: you failed to designate a person qualified to act as an emergency coordinator.
10. Pursuant to 35 Ill. Adm. Code 725.152(f), the contingency plan must include an evacuation plan for facility personnel, if necessary. You are in apparent violation of 35 Ill. Adm. Code 725.152(f) for the following reason(s): no evacuation plan has been developed.
11. Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:
 - a) Maintained at the facility;



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- b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams.

You are in apparent violation of 35 Ill. Adm. Code 725.153 in that condition a above was not complied with.

12. Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

1. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;
2. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
3. A description of the steps needed to decontaminate facility equipment during closure;
4. An estimate of the expected year of closure and a schedule for final closure;
5. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): you failed to establish a written closure plan.

13. Pursuant to 35 Ill. Adm. Code 725.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 725.274 for the following reason(s): you failed to inspect areas where containers are stored at least weekly.

JEH:sf/1600e,30-32